

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

JUN 08 2011  
DAVID J. MALAND, CLERK  
BY DEPUTY \_\_\_\_\_

UNITED STATES OF AMERICA

v.

CLEO WILSON

§  
§  
§  
§  
§

No. 4:11CR 130  
Judge Schell

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 29 U.S.C. § 501(c)  
(Embezzlement of Assets)

Between in or about February 2007 and in or about September 2009, in the Eastern District of Texas, the defendant, **Cleo Wilson**, while an officer, that is, Financial Secretary of Steelworkers Local 1856, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use moneys, funds, securities, property, and other assets of this labor organization in the approximate amount of \$30,206.19.

In violation of 29 U.S.C. § 501(c).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

**Pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461**

As the result of committing the offenses alleged in this Indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461 all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned offenses, including but not limited to the following:

**Cash Proceeds**

Approximately \$30,206.19 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the foregoing offenses alleged in this Indictment.

**Substitute Assets**

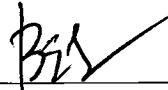
If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(a)(4), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offenses alleged in this Indictment, any and all interest the defendants have in the above-described property is vested in and forfeited to the United States.

A TRUE BILL



GRAND JURY FOREPERSON

JOHN M. BALES  
UNITED STATES ATTORNEY



M. Andrew Stover  
Assistant United States Attorney  
Texas State Bar No. 19349300  
101 East Park Boulevard, Suite 500  
Plano, Texas 75074  
Tel: (972) 509-1201  
Fax: (972) 509-1209

6/8/11

Date

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**NOTICE OF PENALTY**

**Count One**

Violation:	29 U.S.C. § 501(c)
Penalty:	Not more than five years imprisonment, a fine not to exceed \$250,000, or twice any pecuniary gain to Defendant or gross loss to any victim(s) or both; supervised release of not more than three years.
Special Assessment:	\$100.00